

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**615 RIVER ROAD PARTNERS, LLC,
a Delaware limited liability company,**

Plaintiff,

vs.

**BOROUGH OF EDGEWATER, a
municipal corporation of the State of
New Jersey, and JOHN DOES and
JANE DOES Nos. 1-100,**

Defendants.

**Civil Action No.
2:17-cv-12659-JMV-CLW**

**NOTICE OF MOTION TO
SEAL OR REDACT
SUBMISSIONS**

Return Date: November 7, 2022

**ORAL ARGUMENT
REQUESTED**

PLEASE TAKE NOTICE that on November 7, 2022, at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for defendant Borough of Edgewater, shall move before the above-named Court, at the United States District Court, Martin Luther King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Courtroom 4C, Newark, New Jersey 07101, for an Order (a) having a block quote of a portion an earlier draft of the Settlement Agreement in this matter remain redacted in Edgewater's Reply Brief, and having that entire draft and the Supplemental Affidavit with which that draft was submitted remain under seal, or (b) alternatively, in addition to that redaction in the Reply Brief, having the entire exhibit to Edgewater's Reply Affidavit be redacted.

PLEASE TAKE FURTHER NOTICE that, in support of said Motion, the undersigned shall rely upon the enclosed Brief, Affidavit of Joseph R. Mariniello, Esq. and proposed form of Order.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

**DECOTIIS, FITZPATRICK, COLE &
GIBLIN, LLP**

Attorney for Defendant

By: s/John A. Stone, Esq.

John A. Stone, Esq.
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(201) 928-1100

Dated: October 5, 2022

**MARINIELLO & MARINIELLO,
P.C.**

**Joseph R. Mariniello, Esq.
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(201) 947-6600
Co-Counsel for the Defendant,
Borough of Edgewater**

**DECOTIIS, FITZPATRICK,
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